## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

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v.

Case No. 1:19-CR-283

OKSANA VOVK,

Defendant.

## **MOTION**

The United States of America, by its attorneys, G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, and Karolina Klyuchnikova, Special Assistant United States Attorney (LT), moves this Court pursuant to U.S.S.G. § 3E1.1(b) to grant an additional one-level reduction in the offense level for acceptance of responsibility. The government states that the defendant has assisted authorities in the investigation and prosecution of her own misconduct by timely notifying the United States of the defendant's intention to enter a plea of guilty, thereby permitting the United States to avoid preparing for trial and permitting the United States and the court to allocate their resources efficiently.

Respectfully submitted,

G. Zachary Terwilliger United States Attorney

Date: February 3, 2020 By:

Karolina Klyuchnikova Special Assistant United States Attorney (LT)

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of February, 2020, I filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Karolina Klyuchnikova Special Assistant United States Attorney United States Attorney's Office 2100 Jamieson Avenue Alexandria, VA 22314

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